

EXHIBIT 4

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

4 DOROTHY FORTH, DONNA BAILEY,)
5 LISA BULLARD, RICARDO GONZALES,)
6 CYNTHIA RUSSO, TROY TERMINE,)
7 INTERNATIONAL BROTHERHOOD OF)
8 ELECTRICAL WORKERS LOCAL 38)
9 HEALTH AND WELFARE FUND,)
10 INTERNATIONAL UNION OF)
11 OPERATING ENGINEERS LOCAL 295-)
12 295C WELFARE FUND, AND)
13 STEAMFITTERS FUND LOCAL 439, on)
Behalf of Themselves and All)
Similarly Situated,)
Plaintiffs,)
vs.) Civil No. 17-CV-2246
WALGREEN CO.,)
Defendant.)

** C O N F I D E N T I A L **

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2

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1 I remember. I don't remember anything above
2 this email.

3 Q Okay.

4 A Or beyond this email.

5 Q [REDACTED]

6 [REDACTED]

7 [REDACTED] [REDACTED]

8 A [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 Q [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 Q [REDACTED]

19 [REDACTED]

20 A [REDACTED]

21 Q [REDACTED] [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 A [REDACTED]
6 Q [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 Q [REDACTED]
23 [REDACTED]
24 A [REDACTED]
25 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 Q [REDACTED]
10 A [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 Q Okay. And do you know who within your team or
14 Mr. Slanski's team had to perform that process?
15 A At one point it was Paul Vroman. He was running
16 it. But then it transitioned to a couple of
17 other people that I don't recall their names
18 right now.
19 Q Do you remember what Mr. Vroman's title or
20 position was in the 2014 time frame?
21 A 2014, I don't know what his title was, but he
22 was under Tools and Systems. So that would have
23 been I think under Blake's organization.
24 Q So Mr. Vroman didn't report to you in 2014?
25 A In 2014.

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1 Q But then subsequently he did?

2 A Yes.

3 Q When did he begin reporting to you?

4 A Sometime between 2014 and 2018.

5 Q [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 A [REDACTED]

9 [REDACTED]

10 Q [REDACTED]

11 [REDACTED]

12 A [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 Q [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 A [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 Q [REDACTED] [REDACTED]

25 [REDACTED]

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1 Q And so for the record, Richard is Richard
2 Ashworth?

3 A Uh-huh.

4 Q Brad is Bradley Fluegel?

5 A Fluegel, correct.

6 Q Who is Richard Ashworth?

7 A Richard, I don't know his exact title at this
8 point in time, but he's -- he was basically over
9 all of Operations, the stores.

10 Q And who was Bradley Fluegel?

11 A Bradley Fluegel was -- I don't recall his
12 specific title, but he was Blake's boss, I
13 think, and Scott Schuler's boss.

14 Q [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 A [REDACTED]

19 [REDACTED]

20 Q [REDACTED]

21 [REDACTED]
22 MR. LEIB: I just instruct the witness if
23 there's any privileged communications that you
24 had regarding that not to disclose any
25 privileged communications.

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1 THE WITNESS: I can't answer that.

2 BY MR. GUGLIELMO:

3 Q Is it that you can't answer it because it's
4 privileged?

5 A Uh-huh.

6 Q So there were -- it was a legal discussion; is
7 that correct?

8 A Uh-huh.

9 Q [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 A [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 A [REDACTED]

21 Q And do you recall seeing this document before?

22 A Vaguely, yes.

23 Q Did you help in creating it?

24 A Not the actual typing, I don't recall creating
25 it, but I helped with the content.

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1 Q By "the content," what exactly did you help
2 with?
3 A The research and creating of the options and the
4 message, I guess.
5 Q Okay. And who was the audience for this
6 document? Do you know?
7 A At this point in time it was Richard and Brad.
8 So they could make the decision of -- well,
9 feedback on the options and time lines.
10 Q Okay. And other than yourself, were there
11 individuals that reported to you, part of your
12 teams that were involved in gathering
13 information for this PowerPoint?
14 A To the best of my ability to remember, whoever
15 was running the PSC pricing card at that time,
16 I'm not sure if Cindy Jen was still here or if
17 that was under Julie and Eddy and Kelly at that
18 point in time. Whoever owned that would've had
19 an opinion, and then I think that's probably the
20 only people on my team. There would be other
21 teams involved.
22 Q Okay. And turn to the first substantive page of
23 the PowerPoint. It's ending in Bates -68.

24

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1 [REDACTED]
2 [REDACTED]
3 A [REDACTED]
4 Q [REDACTED]
5 A [REDACTED]
6 Q [REDACTED]
7 [REDACTED]
8 A [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 Q [REDACTED]
25 [REDACTED]

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1

CERTIFICATE

2

3

I, Richard D. Ehrlich, a Certified Shorthand
Reporter of the State of Illinois, CSR License No.
084-4018, do hereby certify that I stenographically
reported the proceedings had at the video deposition,
as aforesaid, and that the foregoing transcript is a
true and accurate record of the proceedings had
therein.

9

10

IN WITNESS WHEREOF, I do set my hand at

Chicago, Illinois, this 19th day of December, 2019.

11

12

13

14



Richard D. Ehrlich

Certified Shorthand Reporter

License No. 084.4018

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